

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Almany Ismael Bangoura, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

Beiersdorf, Inc. and Bayer Healthcare, LLC,

Defendant.

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Case No.: 1:22-cv-00291-BMC

NOTICE OF MOTION

PLEASE TAKE NOTICE that on a date and time to be determined by the Court, Plaintiff will move the Court pursuant to Federal Rule of Civil Procedure 23(e) and upon the accompanying Memorandum of Law and the Declaration of Jason P. Sultzer, Esq., for an Order: 1) preliminarily approving this proposed class action settlement; 2) preliminarily certifying the class for settlement purposes; and 3) granting approval of the proposed notice plan.

Dated: August 1, 2022

Respectfully submitted,

By: /s/ Jason P. Sultzer

Jason P. Sultzer

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Attorneys for Plaintiff and the Settlement Class